



UNITED STATES POSTAL SERVICE,)
)
 Petitioner,)
)
 v.)
)
POSTAL REGULATORY COMMISSION,)
)
 Respondent.)

Case No. 13-1308

PETITION FOR REVIEW

The United States Postal Service petitions this Court for review of Postal Regulatory Commission (“PRC”) Order Number 1890, *Order on Price Adjustments for Market Dominant Products and Related Mail Classification Changes*, in PRC Docket Number R2013-10. Order Number 1890, which was filed on November 21, 2013, held, among other things, that certain mail-preparation requirements were governed by restrictions on rate increases set forth in 39 U.S.C. § 3622(d). A copy of the relevant pages of the 107-page Order – pages 1 through 37 and pages 106 through 107 – is attached hereto as Exhibit A. The complete Order Number 1890 is located on the PRC’s online docket at <http://www.prc.gov/Docs/88/88340/Order%20No.%201890.pdf>.

This Court has jurisdiction to review an order of the PRC, and venue is proper in this Circuit. 39 U.S.C. § 3663. This Petition for Review is timely under 39 U.S.C. § 3663.

Respectfully submitted,

THOMAS J. MARSHALL
General Counsel &
Executive Vice President
United States Postal Service

R. ANDREW GERMAN
Managing Counsel, Legal Strategy
United States Postal Service
475 L'Enfant Plaza, SW
Washington, D.C. 20260-1127
(202) 268-3034

STEPHAN J. BOARDMAN
Chief Counsel
United States Postal Service
475 L'Enfant Plaza, SW
Washington, D.C. 20260-1127
(202) 268-7114



DAVID C. BELT
Appellate Counsel
United States Postal Service
475 L'Enfant Plaza, SW
Washington, D.C. 20260-1127
(202) 268-2945

Attorneys for the United States Postal Service

Dated: December 20, 2013
Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2013, I caused a copy of the foregoing Petition for Review to be served by First Class U.S. Mail, postage prepaid, on the following:

Stephen L. Sharfman
Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, DC 20268-0001
Counsel for the Postal Regulatory Commission

Ian D. Volner
Matthew D. Field
VENABLE LLP
575 7th Street, NW
Washington, DC 20004
Counsel for Association for Postal Commerce

Jerry Cerasale
Senior Vice President for Government Affairs
DIRECT MARKETING ASSOCIATION, INC.
1615 L Street, NW, Suite 1100
Washington, DC 20036-5624

Ken Garner
President and CEO
ASSOCIATION OF MARKETING SERVICE PROVIDERS
1800 Diagonal Road, Suite 320
Alexandria, VA 22314-2806

David M. Levy
VENABLE LLP
575 7th Street, NW
Washington, DC 20004
Counsel for MPA – The Association of Magazine Media and Alliance of Nonprofit Mailers

Anita Pursley
Vice President, Postal Affairs
RR DONNELLEY
107 Waters Edge
Dawsonville, GA 30534

Joseph E. Schick
Director of Postal Affairs
QUAD/GRAPHICS, INC.
N61 W23044 Harry's Way
Sussex, WI 53089

Mury Salls
President
MAJOR MAILERS ASSOCIATION
DST Mailing Services
3531 Kilpatrick Lane
Snellville, GA 30039

Tonda F. Rush
CNLC, LLC
PO Box 5737
Arlington, VA 22205
*Counsel for National Newspaper
Association*

Mike Hettinger
SOFTWARE & INFORMATION
INDUSTRY ASS'N/AMERICAN
BUSINESS MEDIA
1090 Vermont Avenue, NW, Suite 600
Washington, DC 20005

Arthur B. Sackler
Executive Director
NATIONAL POSTAL POLICY
COUNCIL
750 National Press Building
529 14th Street, NW
Washington, DC 20004

Kenneth E. Richardson
John P. Klingenberg
901 New York Avenue, NW, Suite 200
Washington, DC 20268-0001
Public Representative

William J. Olson
John S. Miles
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
370 Maple Avenue West, Suite 4
Vienna, VA 22180-5615
*Counsel for Valpak Direct Marketing
Systems, Inc., and Valpak Dealers'
Association, Inc.*

Michael Makin
President & CEO
PRINTING INDUSTRIES OF
AMERICA
601 13th Street, NW,
Suite 350 South
Washington, DC 20005-3807

Robert Galaher
Executive Director and CEO
NATIONAL ASSOCIATION OF
PRESORT MAILERS
PO Box 3552
Annapolis, MD 21403-3552

William B. Baker
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006-2304
*Counsel for National Postal Policy
Council*

Seth Weisberg
Chief Legal Officer
Stamps.com
1990 E. Grand Avenue
El Segundo, CA 90245-5013

Hamilton Davison
President & Executive Director
THE AMERICAN CATALOG
MAILERS ASSOCIATION, INC.
PO Box 41211
Providence, RI 02940-1211

James Pierce Myers
Attorney at Law
320 South West Street,
Suite 110
Alexandria, VA 22314
Counsel for PITNEY BOWES INC.

Michael F. Scanlon
K&L GATES LLP
1601 K Street, NW
Washington, DC 20006
Counsel for PITNEY BOWES INC.

David F. Stover
GREETING CARD ASSOCIATION
2970 S. Columbus St., No. 1B
Arlington, VA 22206-1450

Darryl J. Anderson
O'Donnell, Schwartz &
Anderson, P.C.
1300 L Street NW, Suite 1200
Washington, DC 20005-4126
*Counsel for American Postal Workers
Union, AFL-CIO*

Jerry Faust
Vice President, Print & Distribution
TIME INC.
1271 Avenue of the Americas
New York, NY 10020

I further certify I included a copy of Exhibit A, the relevant pages of the 107-page Order under review, only with the copy of the foregoing Petition for Review that was served on the Respondent, the Postal Regulatory Commission. The remaining persons and entities on this service list filed comments in the proceedings below.



DAVID C. BELT